

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

BMR No. 1 LLC d/b/a  
MIKE JUNEAU'S BROOKFIELD BUICK  
GMC

and

E.J. SALENTINE, INC. d/b/a  
SALENTINE BUICK

Case No. 10-cv-376-wmc

Plaintiffs,

v.

GENERAL MOTORS LLC

Defendant.

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**DEFENDANT GENERAL MOTORS LLC'S MOTION FOR LEAVE TO FILE  
DOCUMENT UNDER SEAL**

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Defendant General Motors LLC (“GM”), by it’s attorney’s Godfrey & Kahn, S.C. hereby moves the Court to file under seal Exhibit B, Wind-Down Agreement, between GM and E.J. Salentine, Inc. entered June 1, 2009, attached to it’s Notice of Removal filed July 9, 2010, as Document No. 1. In support of this Motion, GM states as follows:

That the Wind-Down Agreement contains confidentiality terms and includes confidential, proprietary business information as part of the agreement.

WHEREFORE, all the foregoing reasons, GM respectfully requests that the Court enter an order which allows this document to be filed under seal.

July 9, 2010

Respectfully submitted,

By: *s/Douglas M. Poland*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 9, 2010 a true and accurate copy of the foregoing was filed with the Clerk of the Court using the CM/ECF filing system which will send notification of such filing to the following ECF participants:

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Dated this 9<sup>th</sup> day of July, 2010

*s/Matthew P. Veldran* \_\_\_\_\_

Matthew P. Veldran

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